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Dear Strategic Planning Team,

South Staffordshire Council Local Plan Review – Preferred Options November 2021

Thank you for consulting Birmingham City Council on the Preferred Options document for the South Staffordshire Council Local Plan Review.

The City Council welcomes the approach being taken in the Local Plan Review particularly with regard to the strategic matters of housing and employment provision identified within the Preferred Options as well as the opportunity for continued close working and dialogue with the City Council and other local authorities within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) as part of Duty to Cooperate arrangements.

Unmet housing needs from the wider housing market area.

A housing shortfall of 37,900 within Birmingham was first identified during the development of the Birmingham Development Plan. Since then, the 14 local authorities that comprise the HMA, including South Staffs, have been working together to regularly update housing land supply capacity across the whole HMA and identify possible solutions and areas of search which could be further explored within individual Local Plan reviews across the HMA area. The latest published Position Statement by the 14 Authorities in September 2020 identified a shortfall of only 2,597 homes across the whole HMA up to 2031, with a significant proportion of this shortfall met by Birmingham City Council itself, mainly through high density windfall schemes not previously identified coming forward in and around the City Centre. However, a further update has since been drafted, due for publication in December 2021, showing that the shortfall has now risen to 6,302.

Whilst the Position Statements demonstrate that some progress has been made, work has continued on the Black Country Plan which has identified a housing shortfall within its area of 28,239 homes in the recent publication of their Draft Plan (August 2021). This shortfall, coupled with recent changes to the housing need methodology, which will have a significant impact on Birmingham and Wolverhampton, will have a further significant impact on housing shortfalls experienced across the HMA both up to and beyond 2031.

It is therefore important that the 14 local authorities that comprise the HMA continue to work together to identify possible solutions and areas of search which could be further explored within individual Local

Plan reviews across the HMA area. The issues were partially explored through the 2018 Strategic Growth Study but the City Council's position is that this work now needs updating to further identify solutions to strategic housing shortfalls which are likely to continue within the West Midlands.

Birmingham City Council has recently commenced work on the Birmingham Plan to replace the BDP and evidence has been commissioned to carry out a Housing and Employment Development Needs Assessment (HEDNA) as well as a Housing and Employment Land Availability Assessment (HELAA). These two studies, coupled with wider urban capacity work, will establish Birmingham's position over the next few months on land supply for strategic housing and employment uses and establish any potential levels of shortfall. Given that recent changes to the methodology for housing need could result in significant increases in Birmingham's housing requirement, (along with the fact that Birmingham has always been a net exporter of housing for a number of decades), it is envisaged that significant housing shortfalls will continue to be experienced in the City once all of the latest evidence is established and applied to a new timeframe for the Plan up to 2042.

South Staffs Council have been a proactive participant in HMA discussions and in seeking to provide additional housing to meet any shortfalls within Birmingham and the wider the HMA area. This is reflected in the Preferred Options document which specifically attempts to maximise housing provision within South Staffs to provide an additional 4,000 dwellings across the local authority area as a contribution towards meeting shortfalls identified elsewhere within the HMA, effectively doubling the original housing requirement for the District. This position is particularly welcomed by the City Council which, as previously stated, has been grateful for the help and co-operation received from South Staffs in making significant progress thus far towards reducing that shortfall.

Strategic employment land

The Preferred options document identifies a significant amount of strategic employment sites within its area totalling 553.5 hectares. The City Council recognises the importance of these sites in serving a wider area and supports the provision made within the Local Plan review. This is particularly important for Birmingham and the Black Country as the majority of the conurbation does not have the land capacity to support strategic sites of this size. This includes the new site known as the West Midlands Strategic Rail Freight Interchange (SRFI) which, along with the other identified sites, represents an important source of large employment sites serving not just South Staffs, but the whole of the West Midlands providing 193 ha of new strategic warehousing on a total (gross) land area of 297 ha. It will also generate a significant number of jobs (around 8,500) and covers a wide labour catchment area.

The employment issues and consequences of the SRFI have been examined by Stantec in a Response Paper jointly commissioned by South Staffs and the Black Country. This has included a study of the apportionment of land on the SRFI site and provides an estimate of the distribution of the 'need' being addressed by the SRFI between plan making councils in the market or service area as appropriate. The Study acknowledges the position previously established by Savills on behalf of the SRFI that the site relates closely to, and will serve, the Black Country and Birmingham markets.

The land share assumptions were calculated based on each authority's projected population increases under the 2018-based Population Projections which was then balanced against the proportionate share of each authority's existing strategic warehousing floorspace. On this basis, the study concluded that the Black Country's share of the overall SRFI land area is 72 ha or 37% of the total but also that Birmingham's share is 53 hectares which is still quite a substantial proportion of the site.

As mentioned, the City Council has recently commissioned a HEDNA as part of its evidence base for the new Birmingham Plan. Early indications of the findings of the HEDNA show that the Birmingham Plan will continue to face challenges in meeting its own employment land needs although the exact amount and the nature of the employment need will only become apparent once development options and urban capacity work have been fully evaluated. It is therefore important that the impact of the SRFI, along with other strategic employment sites, and the implications for Birmingham's employment land supply are fully reflected within any Statement of Common Ground agreed between the City Council and South Staffs as part of the formulation of both Local Plans.

Longer term growth aspirations for a new settlement.

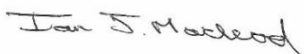
The Preferred Options document also makes provision for the long-term aspirations of South Staffs Council to explore potential options within the district for a sustainable independent new settlement which has the capacity to accommodate the future housing and economic needs of the district. It is recognised that such a settlement will not provide housing for the current plan period but forms an option for the Council to explore in future plan-making. Again, this is welcomed by the City Council in setting out future growth options at an early stage. A revised and updated Strategic Growth Strategy for the whole of the GBBCHMA would also assist in further clarifying whether this would be a viable option for a future Local Plan Review and help towards the continued housing supply issues faced by the West Midlands and the HMA.

Summary

In summary, Birmingham City Council is fully supportive of the approach and commitment made by South Staffs in helping to address the long-term strategic housing and employment issues faced by the West Midlands and the GBBCHMA. I trust that these comments are helpful and the City Council looks forward to continued engagement with South Staffs through Duty to Cooperate arrangements and in jointly formulating Statements of Common Ground, particularly for the issues highlighted above, to assist with the progression of both the South Staffs Local Plan Review and the Birmingham Plan.

If you require any further information or input from Birmingham City Council in formulating your Local Plan Review, please do not hesitate to contact us at planningstrategy@birmingham.gov.uk.

Yours faithfully



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